

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors. ¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO INFORM AMERINATIONAL COMMUNITY SERVICES, LLC'S
APPEARANCE AT THE JUNE 17, 2022 HTA DISCLOSURE STATEMENT HEARING**

COMES NOW AmeriNational Community Services, LLC (hereafter "AmeriNat") as servicer for the GDB Debt Recovery Authority (the "DRA") authorized to pursue and enforce the DRA's rights and remedies in any legal proceeding, including the DRA's participation as a creditor in the instant Title III case, by and through the undersigned legal counsel, and respectfully submits this motion in compliance with the Court's *Order Regarding Procedures For June 17, 2022, Disclosure Statement Hearing* (Dkt. No. 21068) (the "Scheduling Order")²:

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Building Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms used herein and otherwise not defined shall have the meaning ascribed to such term in the Scheduling Order.

1. Attorney Arturo J. García-Solá and/or Nayuan Zouairabani of McConnell Valdés, LLC will appear on behalf of AmeriNat at the June 17, 2022 Disclosure Statement hearing (the “Hearing”), which will be conducted virtually via videoconferencing (Zoom).

2. The email address of Mr. García-Solá is ajg@mcvpr.com and the email address of Mr. Zouairabani is nzt@mcvpr.com. Further, Mr. García-Solá and Mr. Zouairabani hereby submit their Party Appearance Cover Sheet as **Exhibit A** to this motion.

3. AmeriNat reserves the right to be heard and present oral argument on any matter identified in the agenda to be filed by the Oversight Board in connection with the Hearing, or to address any statement or issue that may be raised by any party at the Hearing related to the Title III cases or adversary proceedings which may affect the interests of the DRA. For the avoidance of doubt, such matters may include, but are not limited to:

- a. *Disclosure Statement for the Amended Title III Plan of Adjustment for the Puerto Rico Highways and Transportation Authority* (Dkt. No. 20839);
- b. *Amended Title III Plan of Adjustment of the Puerto Rico Highways and Transportation Authority* (Dkt. No. 20828);
- c. *Motion of the Puerto Rico Highways and Transportation Authority for an Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* (Dkt. No. 20655);
- d. *Motion of the Puerto Rico Highways and Transportation Authority for an Order (I) Approving Disclosure Statement, (II) Fixing Voting Record Date, (III) Approving Confirmation Hearing Notice and Confirmation Schedule, (IV) Approving Solicitation Packages and Distribution Procedures, (V) Approving*

Forms of Ballots, and Voting and Election Procedures, (VI) Approving Notice of Non-Voting Status, (VII) Fixing Voting, Election, and Confirmation Deadlines, and (VIII) Approving Vote Tabulation Procedures (Dkt. No. 20654);

- e. *Notice of Filing of Revised Proposed Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof: (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief* (Dkt. No. 20673); and/or
- f. Any other filing or document related to any of the foregoing.

4. AmeriNat also reserves the right to amend this motion as needed.

WHEREFORE, AmeriNat respectfully requests the Court to take note of the foregoing and deem it in compliance with the Scheduling Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 8th day of June, 2022.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's *Sixteenth Amended Notice, Case Management and Administrative Procedures Order* (Dkt. No. 20190-1) (the "CMP Order"), we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

Attorneys for AmeriNational Community Services, LLC

MCCONNELL VALDÉS LLC
270 Muñoz Rivera Avenue, Suite 7
Hato Rey, Puerto Rico 00918
Telephone: 787-250-5632
Facsimile: 787-759-9225

By: /s/Arturo J. García-Solá
Arturo J. García-Solá

USDC No. 201903
Email: ajg@mcvpr.com

By: /s/Nayuan Zouairabani
Nayuan Zouairabani
USDC No. 226411
Email: nzt@mcvpr.com

EXHIBIT A
PARTY APPEARANCE SHEET

Name of Party	AmeriNational Community Services, LLC
Party Name Abbreviation (For Use with Zoom)	AmeriNat (DRA)
<p>Confirmation Hearing Participants</p> <p>Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party):</p> <ul style="list-style-type: none"> • Name, • Email, • Law Firm, • Phone Number • Docket Entry No. for the Attorney’s Notice of Appearance • Zoom Screen Name (<u>See</u> December Omnibus Hearing procedures Order, ¶ 8(a)) <p>Arturo J. García-Solá ajg@mcvpr.com McConnell Valdés, LLC 787-250-5632 Docket Entry: 18991 AmeriNat (DRA) / García, Arturo / McConnell Valdés, LLC</p> <p>And/or</p> <p>Nayuan Zouairabani-Trinidad nzt@mcvpr.com McConnell Valdés, LLC 787-250-5619 Docket Entry: 4969 AmeriNat (DRA) / Zouairabani, Nayuan / McConnell Valdés, LLC</p>	
If a Party files a supplemental Party Appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a “Supplemental” Party Appearance Sheet.	
<p>Note: Pursuant to the December Omnibus Hearing Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party-in-interest shall be limited to 2 attorneys at any given time.</p>	